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6 Attorneys for Defendant
7 BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC. (erroneously
8 sued as "BOEHRINGER-INGELHEIM
PHARMACEUTICAL")
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 BRENDA PERRY, an Individual,

13 Plaintiff,

14 vs.

15 ASHFIELD HEALTHCARE, LLC, a business
16 entity; BOEHRINGER-INGELHEIM
PHARMACEUTICAL, a business entity;
17 NATE STYLES, an individual; and DOES 1-
25, inclusive,

18 Defendants.
19

Case No:

**EXHIBITS U-Z TO NOTICE OF
REMOVAL BY DEFENDANT
BOEHRINGER INGELHEIM
PHARMACEUTICALS, INC.**

[28 U.S.C. §§ 1332, 1441, and 1446]

Exhibit U

CM-110

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Eric Meckley (SBN 168181); Ashley Baltazar (SBN 284921) Morgan Lewis & Bockius, LLP One Market St., Spear Street Tower, San Francisco, CA 94105 TELEPHONE NO.: 415-442-1000 FAX NO. (Optional): 415-442-1001 E-MAIL ADDRESS (Optional): ashley.baltazar@morganlewis.com ATTORNEY FOR (Name): Defendant Boehringer Ingelheim Pharmaceuticals, Inc.	Electronically FILED by Superior Court of California, County of San Mateo ON 11/26/2019 By /s/ Candi Latini Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Mateo STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94603 BRANCH NAME: Southern Branch	
PLAINTIFF/PETITIONER: Brenda Perry DEFENDANT/RESPONDENT: Ashfield Healthcare LLC et al.	
CASE MANAGEMENT STATEMENT (Check one): <input checked="" type="checkbox"/> UNLIMITED CASE (Amount demanded exceeds \$25,000) <input type="checkbox"/> LIMITED CASE (Amount demanded is \$25,000 or less)	CASE NUMBER: 18CIV05717
A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: December 11, 2019 Time: 9:00 a.m. Dept.: 11 Div.: Room: Address of court (if different from the address above): <input type="checkbox"/> Notice of Intent to Appear by Telephone, by (name):	

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. **Party or parties** (answer one):
 - a. ☒ This statement is submitted by party (name): Boehringer Ingelheim Pharmaceuticals, Inc.
 - b. ☐ This statement is submitted jointly by parties (names):

2. **Complaint and cross-complaint** (to be answered by plaintiffs and cross-complainants only)
 - a. The complaint was filed on (date):
 - b. ☐ The cross-complaint, if any, was filed on (date):

3. **Service** (to be answered by plaintiffs and cross-complainants only)
 - a. ☐ All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
 - b. ☐ The following parties named in the complaint or cross-complaint
 - (1) ☐ have not been served (specify names and explain why not):
 - (2) ☐ have been served but have not appeared and have not been dismissed (specify names):
 - (3) ☐ have had a default entered against them (specify names):
 - c. ☐ The following additional parties may be added (specify names, nature of involvement in case, and date by which they may be served):

4. **Description of case**
 - a. Type of case in ☒ complaint ☐ cross-complaint (Describe, including causes of action):
 Plaintiff alleges causes of action for (1) sexual harassment, (2) age discrimination, (3) retaliation, (4) wrongful termination in violation of public policy, and (5) intentional infliction of emotional distress

CM-110

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare LLC et al.	18CIV05717

4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*
See attachment 4(b).

☒ *(If more space is needed, check this box and attach a page designated as Attachment 4b.)*

5. **Jury or nonjury trial**

The party or parties request ☒ a jury trial ☐ a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*

Plaintiff has requested a jury trial.

6. **Trial date**

a. ☒ The trial has been set for *(date)*:

b. ☐ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain)*:

See Attachment 6(b).

c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability)*:
December 20-30, 2019 (pre-planned travel); January 20, 2020 - February 10, 2020 (Trial); June 1-30, 2020 (Trial); October 20-28, 2020 (out of state business).

7. **Estimated length of trial**

The party or parties estimate that the trial will take *(check one)*:

a. ☒ days *(specify number)*: 7-10 days

b. ☐ hours (short causes) *(specify)*:

8. **Trial representation** *(to be answered for each party)*

The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:

a. Attorney:

b. Firm:

c. Address:

d. Telephone number:

f. Fax number:

e. E-mail address:

g. Party represented:

☐ Additional representation is described in Attachment 8.

9. **Preference**

☐ This case is entitled to preference *(specify code section)*:

10. **Alternative dispute resolution (ADR)**

a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.

(1) For parties represented by counsel: Counsel ☒ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.

(2) For self-represented parties: Party ☐ has ☐ has not reviewed the ADR information package identified in rule 3.221.

b. **Referral to judicial arbitration or civil action mediation** (if available).

(1) ☐ This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.

(2) ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.

(3) ☒ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*:

CRC 3.811(b)(8): amount in controversy exceeds \$50,000

CM-110

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare LLC et al.	18CIV05717

10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>):
(1) Mediation	<input type="checkbox"/>	<input type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (date): <input type="checkbox"/> Agreed to complete mediation by (date): <input type="checkbox"/> Mediation completed on (date):
(2) Settlement conference	<input type="checkbox"/>	<input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (date): <input type="checkbox"/> Agreed to complete settlement conference by (date): <input type="checkbox"/> Settlement conference completed on (date):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (date): <input type="checkbox"/> Agreed to complete neutral evaluation by (date): <input type="checkbox"/> Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete judicial arbitration by (date): <input type="checkbox"/> Judicial arbitration completed on (date):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete private arbitration by (date): <input type="checkbox"/> Private arbitration completed on (date):
(6) Other (<i>specify</i>):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (date): <input type="checkbox"/> Agreed to complete ADR session by (date): <input type="checkbox"/> ADR completed on (date):

CM-110

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare LLC et al.	18CIV05717

11. Insurance

- a. ☐ Insurance carrier, if any, for party filing this statement (*name*):
- b. Reservation of rights: ☐ Yes ☐ No
- c. ☐ Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

☐ Bankruptcy ☐ Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. ☐ There are companion, underlying, or related cases.
- (1) Name of case:
- (2) Name of court:
- (3) Case number:
- (4) Status:
- ☐ Additional cases are described in Attachment 13a.
- b. ☐ A motion to ☐ consolidate ☐ coordinate will be filed by (*name party*):

14. Bifurcation

- ☐ The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

15. Other motions

- ☒ The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):
- Defendant anticipates filing a motion for summary judgment and/or motion for summary adjudication of issues after it has deposed Plaintiff.

16. Discovery

- a. ☐ The party or parties have completed all discovery.
- b. ☒ The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
Boehringer Ingelheim Pharmaceuticals, Inc.	Plaintiff's deposition	March 2020
Boehringer Ingelheim Pharmaceuticals, Inc.	Written Discovery	June 2020
Boehringer Ingelheim Pharmaceuticals, Inc.	Third party discovery	June 2020

- c. ☒ The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):
- BIPI has filed a motion to compel discovery against Plaintiff that is scheduled to be heard on January 14, 2020.

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PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER: 18CIV05717
DEFENDANT/RESPONDENT: Ashfield Healthcare LLC et al.	

17. Economic litigation

- a. ☐ This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b. ☐ This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed *(if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case)*:

18. Other issues

- ☒ The party or parties request that the following additional matters be considered or determined at the case management conference *(specify)*:
See Attachment 18.

19. Meet and confer

- a. ☒ The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court *(if not, explain)*:
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following *(specify)*:

20. Total number of pages attached *(if any)*: 3

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: November 26, 2019

Ashley A. Baltazar

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

☐ Additional signatures are attached.

Plaintiff: Brenda Perry
Defendant: Boehringer Ingelheim Pharmaceuticals, Inc.

CM-110
San Mateo Superior Court
Case No. 18CIV05717

Attachment 4(b)

Plaintiff Brenda Perry ("Plaintiff") was employed by Defendant Ashfield Healthcare, LLC ("Ashfield") beginning in April 2017 as a sales representative and was assigned to support a Boehringer Ingelheim Pharmaceuticals, Inc. ("BIPI") territory. During her employment with Ashfield, Plaintiff claims that she was sexually harassed by BIPI employee Nate Styles and that Mr. Styles engaged in illegal "off label" marketing. She further alleges that she complained about Mr. Styles' behavior to Ashfield. In September 2017, BIPI went through an internal reorganization, which resulted in Ashfield terminating Plaintiff's employment. Plaintiff now claims that she suffered sexual harassment and that her termination by Ashfield constituted discrimination, retaliation, wrongful termination, and intentional infliction of emotional distress. Plaintiff claims that BIPI was a joint employer. BIPI denies Plaintiff's claims and denies that it is liable to Plaintiff for any damages. BIPI will seek to recover its attorneys' fees and costs to the fullest extent possible under applicable law in the event it prevails on the alleged claims.

Plaintiff: Brenda Perry
Defendant: Boehringer Ingelheim Pharmaceuticals, Inc.

CM-110
San Mateo Superior Court
Case No. 18CIV05717

Attachment 6(b)

This case is not yet at issue because named defendant Nate Stiles has not been served, despite the fact that the complaint was filed more than one year ago on October 22, 2018. BIPI contends that this action cannot significantly proceed unless and until Defendant Stiles is served or, alternatively, dismissed. In addition, due to removal to Federal court and subsequent remand, the case will not be ready for trial within 12 months of the date of the filing of the complaint.

Plaintiff: Brenda Perry
Defendant: Boehringer Ingelheim Pharmaceuticals, Inc.

CM-110
San Mateo Superior Court
Case No. 18CIV05717

Attachment 18

BIPI understands that Defendant Nate Stiles has not been served. Under California Rules of Court, rule 3.110, subd. (d), “[t]he complaint must be served on all named defendants and proofs of service on those defendants must be filed with the court within 60 days after the filing of the complaint.” If a plaintiff fails to serve a defendant within such time period, then the court “may issue an order to show cause why sanctions shall not be imposed.” Cal. Rules of Court, rule 3.110, subd. (f). Given the length of time that has passed since the filing of the original complaint and Plaintiff’s failure to serve Mr. Stiles despite being given multiple opportunities to do so, BIPI requests the Court set an OSC re: service or dismissal of Defendant Stiles.

PROOF OF SERVICE

I, Robin Onaka, declare:

I am a citizen of the United States and employed in San Francisco County, California. I am over the age of eighteen years and not a party to the within entitled action. My business address is One Market, Spear Street Tower, San Francisco, CA 94105-1596. On November 26, 2019, I served a copy of the within document(s):

**DEFENDANT BOEHRINGER INGELHEIM PHARMACEUTICALS, INC.'S
CASE MANAGEMENT STATEMENT**

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☒ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed Federal Express envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to a Federal Express agent for delivery.
- ☐ by causing to be personally delivered the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

Michael T. Welch
Law Offices of Michael T. Welch
Four Embarcadero Center, 14th Floor
San Francisco, California 94111
Tel: +1.415.426.5691
Fax: +1.415.399.0445

Attorneys for Plaintiff Brenda Perry

Rebecca Benhuri
Littler Mendelson, P.C.
333 Bush Street, 34th Floor
San Francisco, CA 94104
Tel: +415.433.1940
Fax: +415.399.8490

*Attorneys for Defendant
Ashfield Healthcare, LLC*

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on

1 motion of the party served, service is presumed invalid if postal cancellation date or postage
2 meter date is more than one day after date of deposit for mailing in affidavit.

3 Executed on November 26, 2019, at San Francisco, California. I declare that I am
4 employed in the office of a member of the bar of this court at whose direction the service was
5 made.



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Robin Onaka

Exhibit V

CM-110

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Michael Welch (SBN 122630) Law Offices of Michael Welch Four Embarcadero Center, 14th Floor, San Francisco, CA 94111 TELEPHONE NO.: 415-426-5691 FAX NO. (Optional): E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name):	Electronically FILED by Superior Court of California, County of San Mateo ON 12/3/2019 By /s/ Candi Latini Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94063 BRANCH NAME: Southern Branch	CASE NUMBER: 18CIV05717
PLAINTIFF/PETITIONER: Brenda Perry DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC; et al.	
CASE MANAGEMENT STATEMENT (Check one): <input checked="" type="checkbox"/> UNLIMITED CASE (Amount demanded exceeds \$25,000) <input type="checkbox"/> LIMITED CASE (Amount demanded is \$25,000 or less)	
A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: December 11, 2019 Time: 9:00 A.M. Dept.: 11 Div.: Room: Address of court (if different from the address above): <input checked="" type="checkbox"/> Notice of Intent to Appear by Telephone, by (name): Michael Welch	

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. **Party or parties** (answer one):
 - a. ☒ This statement is submitted by party (name): Plaintiff Brenda Perry
 - b. ☐ This statement is submitted **jointly** by parties (names):

2. **Complaint and cross-complaint** (to be answered by plaintiffs and cross-complainants only)
 - a. The complaint was filed on (date): 10/22/2018
 - b. ☐ The cross-complaint, if any, was filed on (date):

3. **Service** (to be answered by plaintiffs and cross-complainants only)
 - a. ☒ All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
 - b. ☐ The following parties named in the complaint or cross-complaint
 - (1) ☐ have not been served (specify names and explain why not):
 - (2) ☐ have been served but have not appeared and have not been dismissed (specify names):
 - (3) ☐ have had a default entered against them (specify names):
 - c. ☐ The following additional parties may be added (specify names, nature of involvement in case, and date by which they may be served):

4. **Description of case**
 - a. Type of case in ☒ complaint ☐ cross-complaint (Describe, including causes of action):
 Employment case, with causes of action for age discrimination; harassment; retaliation; wrongful termination; and intentional infliction of emotional distress.

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PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC; et al.	18CIV05717

4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*
 Plaintiff was hired by Ashfield to be a sales representative for defendant BI's diabetes treatment products, to medical providers. Plaintiff alleges she was wrongfully terminated because she refused to sell those products "off label" and objected to that practice, and because she also complained that her manager harassed her. Plaintiff alleges damages for lost compensation, emotional distress, and punitive damages.
☐ *(If more space is needed, check this box and attach a page designated as Attachment 4b.)*
5. **Jury or nonjury trial**
 The party or parties request ☒ a jury trial ☐ a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*
6. **Trial date**
 a. ☐ The trial has been set for (date):
 b. ☒ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain):*
 c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability):*
 January - February, 2019 (Trial and an arbitration scheduled in other cases)
7. **Estimated length of trial**
 The party or parties estimate that the trial will take *(check one):*
 a. ☒ days *(specify number):* 5 to 7 days
 b. ☐ hours *(short causes) (specify):*
8. **Trial representation (to be answered for each party)**
 The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:
 a. Attorney:
 b. Firm:
 c. Address:
 d. Telephone number:
 e. E-mail address:
 f. Fax number:
 g. Party represented:
☐ Additional representation is described in Attachment 8.
9. **Preference**
☐ This case is entitled to preference *(specify code section):*
10. **Alternative dispute resolution (ADR)**
 a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.
 (1) For parties represented by counsel: Counsel ☒ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
 (2) For self-represented parties: Party ☐ has ☐ has not reviewed the ADR information package identified in rule 3.221.
 b. **Referral to judicial arbitration or civil action mediation (if available).**
 (1) ☐ This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
 (2) ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
 (3) ☒ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption):*
 Amount in controversy exceeds statutory maximum

CM-110

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC; et al.	18CIV05717

10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>):
(1) Mediation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (date): <input type="checkbox"/> Agreed to complete mediation by (date): <input type="checkbox"/> Mediation completed on (date):
(2) Settlement conference	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (date): <input type="checkbox"/> Agreed to complete settlement conference by (date): <input type="checkbox"/> Settlement conference completed on (date):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (date): <input type="checkbox"/> Agreed to complete neutral evaluation by (date): <input type="checkbox"/> Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete judicial arbitration by (date): <input type="checkbox"/> Judicial arbitration completed on (date):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete private arbitration by (date): <input type="checkbox"/> Private arbitration completed on (date):
(6) Other (<i>specify</i>):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (date): <input type="checkbox"/> Agreed to complete ADR session by (date): <input type="checkbox"/> ADR completed on (date):

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PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC; et al.	18CIV05717

11. Insurance

- a. ☐ Insurance carrier, if any, for party filing this statement (*name*):
- b. Reservation of rights: ☐ Yes ☐ No
- c. ☐ Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

☐ Bankruptcy ☐ Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. ☐ There are companion, underlying, or related cases.
- (1) Name of case:
- (2) Name of court:
- (3) Case number:
- (4) Status:
- ☐ Additional cases are described in Attachment 13a.
- b. ☐ A motion to ☐ consolidate ☐ coordinate will be filed by (*name party*):

14. Bifurcation

- ☐ The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

15. Other motions

- ☐ The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):

16. Discovery

- a. ☐ The party or parties have completed all discovery.
- b. ☒ The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
Plaintiff	Document requests	02/15/2020
Plaintiff	Depositions	04/15/2019

- c. ☐ The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):

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PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER:
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC; et al.	18CIV05717

17. **Economic litigation**

- a. ☐ This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b. ☐ This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

18. **Other issues**

- ☐ The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*):

19. **Meet and confer**

- a. ☒ The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*):

20. Total number of pages attached (*if any*): 0

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: November 26, 2019

Michael Welch

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)

☐ Additional signatures are attached.

Exhibit W

CIV-110

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 122630 NAME: Michael Welch FIRM NAME: Law Offices of Michael Welch STREET ADDRESS: Four Embarcadero Center, 14th Floor CITY: San Francisco STATE: CA ZIP CODE: 94111 TELEPHONE NO.: 415-426-5691 FAX NO.: E-MAIL ADDRESS: mwelchlaw@gmail.com ATTORNEY FOR (Name): Plaintiff Brenda Perry	FOR COURT USE ONLY Electronically FILED by Superior Court of California, County of San Mateo ON 12/3/2019 By /s/ Rjay Dominia Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN MATEO STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94063 BRANCH NAME:	
Plaintiff/Petitioner: Brenda Perry Defendant/Respondent: Ashfield Healthcare, LLC, et al.	
REQUEST FOR DISMISSAL	CASE NUMBER: 18CIV05717
A conformed copy will not be returned by the clerk unless a method of return is provided with the document.	
This form may not be used for dismissal of a derivative action or a class action or of any party or cause of action in a class action. (Cal. Rules of Court, rules 3.760 and 3.770.)	

1. TO THE CLERK: Please **dismiss** this action as follows:

- a. (1) ☐ With prejudice (2) ☒ Without prejudice
 b. (1) ☐ Complaint (2) ☐ Petition
 (3) ☐ Cross-complaint filed by (name):
 (4) ☐ Cross-complaint filed by (name):
 (5) ☐ Entire action of all parties and all causes of action
 (6) ☒ Other (specify):* As to defendant Nate Styles, only.

on (date):

on (date):

2. (Complete in all cases except family law cases.)

The court ☐ did ☒ did not waive court fees and costs for a party in this case. (This information may be obtained from the clerk. If court fees and costs were waived, the declaration on the back of this form must be completed).

Date: November 26, 2019

Michael Welch

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

*If dismissal requested is of specified parties only of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

Attorney or party without attorney for:

- ☒ Plaintiff/Petitioner ☐ Defendant/Respondent
☐ Cross Complainant

3. TO THE CLERK: Consent to the above dismissal is hereby given.**

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

** If a cross-complaint – or Response (Family Law) seeking affirmative relief – is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581 (i) or (j).

Attorney or party without attorney for:

- ☐ Plaintiff/Petitioner ☐ Defendant/Respondent
☐ Cross Complainant

(To be completed by clerk)

4. ☐ Dismissal entered as requested on (date):
 5. ☒ Dismissal entered on (date): **12/3/2019** as to only (name): **AS STATED ABOVE**
 6. ☐ Dismissal **not entered** as requested for the following reasons (specify):

7. a. ☐ Attorney or party without attorney notified on (date):
 b. ☐ Attorney or party without attorney not notified. Filing party failed to provide
☐ a copy to be conformed ☐ means to return conformed copy

Date: **12/3/2019** Neal I. Taniguchi Clerk, by **/s/ Rjay Dominia**, Deputy

Page 1 of 2

CIV-110

Plaintiff/Petitioner: Brenda Perry
 Defendant/Respondent: Ashfield Healthcare, LLC, et al.

CASE NUMBER:
 18CIV05717

COURT'S RECOVERY OF WAIVED COURT FEES AND COSTS

If a party whose court fees and costs were initially waived has recovered or will recover \$10,000 or more in value by way of settlement, compromise, arbitration award, mediation settlement, or other means, the court has a statutory lien on that recovery. The court may refuse to dismiss the case until the lien is satisfied. (Gov. Code, § 68637.)

Declaration Concerning Waived Court Fees

1. The court waived court fees and costs in this action for *(name)*:
2. The person named in item 1 is *(check one below)*:
 - a. ☐ not recovering anything of value by this action.
 - b. ☐ recovering less than \$10,000 in value by this action.
 - c. ☐ recovering \$10,000 or more in value by this action. *(If item 2c is checked, item 3 must be completed.)*
3. ☐ All court fees and court costs that were waived in this action have been paid to the court *(check one)*: Yes No

(Not Applicable)

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)

(SIGNATURE)

Exhibit X

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): REBECCA BENHURI SBN 209443 LITTLER MENDELSON, P.C. 333 Bush Street, 34 th Fl. San Francisco, CA 94104 TELEPHONE NO.: 415.433.1940 FAX NO. (Optional): 415.399.8490 E-MAIL ADDRESS (Optional): rbenhuri@littler.com ATTORNEY FOR (Name): Defendant Ashfield Healthcare, LLC	Electronically FILED by Superior Court of California, County of San Mateo ON 12/92019 By <u>/s/ Candi Latini</u> Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Mateo STREET ADDRESS: 400 County Center MAILING ADDRESS: CITY AND ZIP CODE: Redwood City, CA 94603 BRANCH NAME: Southern Branch	
PLAINTIFF/PETITIONER: Brenda Perry DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC et al.	
CASE MANAGEMENT STATEMENT (Check one): <input checked="" type="checkbox"/> UNLIMITED CASE (Amount demanded exceeds \$25,000) <input type="checkbox"/> LIMITED CASE (Amount demanded is \$25,000 or less)	CASE NUMBER: 18CIV05717
A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: December 11, 2019 Time: 9:00 a.m. Dept.: 11 Div.: Room: Address of court (if different from the address above): <input checked="" type="checkbox"/> Notice of Intent to Appear by Telephone, by (name): Rebecca Benhuri	

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. **Party or parties** (answer one):
 - a. ☒ This statement is submitted by party (name): Ashfield Healthcare, LLC
 - b. ☐ This statement is submitted **jointly** by parties (names):

2. **Complaint and cross-complaint** (to be answered by plaintiffs and cross-complainants only)
 - a. The complaint was filed on (date):
 - b. ☐ The cross-complaint, if any, was filed on (date):

3. **Service** (to be answered by plaintiffs and cross-complainants only)
 - a. ☐ All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
 - b. ☐ The following parties named in the complaint or cross-complaint
 - (1) ☐ have not been served (specify names and explain why not):
 - (2) ☐ have been served but have not appeared and have not been dismissed (specify names):
 - (3) ☐ have had a default entered against them (specify names):
 - c. ☐ The following additional parties may be added (specify names, nature of involvement in case, and date by which they may be served):

4. **Description of case**
 - a. Type of case in ☒ complaint ☐ cross-complaint (Describe, including causes of action):
 Plaintiff alleges various employment-related claims against Defendants.

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER: 18CIV05717
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC et al.	

4. b. Provide a brief statement of the case, including any damages. *(If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date [indicate source and amount], estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)*
Defendant denies that Plaintiff is owed any damages.

☐ *(If more space is needed, check this box and attach a page designated as Attachment 4b.)*

5. **Jury or nonjury trial**

The party or parties request ☐ a jury trial ☒ a nonjury trial. *(If more than one party, provide the name of each party requesting a jury trial):*

6. **Trial date**

- a. ☐ The trial has been set for *(date)*:
b. ☒ No trial date has been set. This case will be ready for trial within 12 months of the date of the filing of the complaint *(if not, explain)*:
c. Dates on which parties or attorneys will not be available for trial *(specify dates and explain reasons for unavailability)*:
8/17/2020 (trial), 9/7/2020 (trial), 9/14/2020 (trial)

7. **Estimated length of trial**

The party or parties estimate that the trial will take *(check one)*:

- a. ☒ days *(specify number)*: 2-3
b. ☐ hours (short causes) *(specify)*:

8. **Trial representation** *(to be answered for each party)*

The party or parties will be represented at trial ☒ by the attorney or party listed in the caption ☐ by the following:

- a. Attorney:
b. Firm:
c. Address:
d. Telephone number:
e. E-mail address:
f. Fax number:
g. Party represented:
☐ Additional representation is described in Attachment 8.

9. **Preference**

☐ This case is entitled to preference *(specify code section)*:

10. **Alternative dispute resolution (ADR)**

- a. **ADR information package.** Please note that different ADR processes are available in different courts and communities; read the ADR information package provided by the court under rule 3.221 for information about the processes available through the court and community programs in this case.
(1) For parties represented by counsel: Counsel ☒ has ☐ has not provided the ADR information package identified in rule 3.221 to the client and reviewed ADR options with the client.
(2) For self-represented parties: Party ☐ has ☐ has not reviewed the ADR information package identified in rule 3.221.
b. **Referral to judicial arbitration or civil action mediation** (if available).
(1) ☐ This matter is subject to mandatory judicial arbitration under Code of Civil Procedure section 1141.11 or to civil action mediation under Code of Civil Procedure section 1775.3 because the amount in controversy does not exceed the statutory limit.
(2) ☐ Plaintiff elects to refer this case to judicial arbitration and agrees to limit recovery to the amount specified in Code of Civil Procedure section 1141.11.
(3) ☐ This case is exempt from judicial arbitration under rule 3.811 of the California Rules of Court or from civil action mediation under Code of Civil Procedure section 1775 et seq. *(specify exemption)*:

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER: 18CIV05717
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC et al.	

10. c. Indicate the ADR process or processes that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (*check all that apply and provide the specified information*):

	The party or parties completing this form are willing to participate in the following ADR processes (<i>check all that apply</i>):	If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (<i>attach a copy of the parties' ADR stipulation</i>):
(1) Mediation	<input type="checkbox"/>	<input type="checkbox"/> Mediation session not yet scheduled <input type="checkbox"/> Mediation session scheduled for (date): <input type="checkbox"/> Agreed to complete mediation by (date): <input type="checkbox"/> Mediation completed on (date):
(2) Settlement conference	<input type="checkbox"/>	<input type="checkbox"/> Settlement conference not yet scheduled <input type="checkbox"/> Settlement conference scheduled for (date): <input type="checkbox"/> Agreed to complete settlement conference by (date) : <input type="checkbox"/> Settlement conference completed on (date):
(3) Neutral evaluation	<input type="checkbox"/>	<input type="checkbox"/> Neutral evaluation not yet scheduled <input type="checkbox"/> Neutral evaluation scheduled for (date): <input type="checkbox"/> Agreed to complete neutral evaluation by (date): <input type="checkbox"/> Neutral evaluation completed on (date):
(4) Nonbinding judicial arbitration	<input type="checkbox"/>	<input type="checkbox"/> Judicial arbitration not yet scheduled <input type="checkbox"/> Judicial arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete judicial arbitration by (date): <input type="checkbox"/> Judicial arbitration completed on (date):
(5) Binding private arbitration	<input type="checkbox"/>	<input type="checkbox"/> Private arbitration not yet scheduled <input type="checkbox"/> Private arbitration scheduled for (date): <input type="checkbox"/> Agreed to complete private arbitration by (date): <input type="checkbox"/> Private arbitration completed on (date):
(6) Other (<i>specify</i>):	<input type="checkbox"/>	<input type="checkbox"/> ADR session not yet scheduled <input type="checkbox"/> ADR session scheduled for (date): <input type="checkbox"/> Agreed to complete ADR session by (date): <input type="checkbox"/> ADR completed on (date):

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER: 18CIV05717
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC et al.	

11. Insurance

- a. ☒ Insurance carrier, if any, for party filing this statement (*name*): Chubb
- b. Reservation of rights: ☒ Yes ☐ No
- c. ☐ Coverage issues will significantly affect resolution of this case (*explain*):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status.

☐ Bankruptcy ☐ Other (*specify*):

Status:

13. Related cases, consolidation, and coordination

- a. ☐ There are companion, underlying, or related cases.
- (1) Name of case:
- (2) Name of court:
- (3) Case number:
- (4) Status:
- ☐ Additional cases are described in Attachment 13a.
- b. ☐ A motion to ☐ consolidate ☐ coordinate will be filed by (*name party*):

14. Bifurcation

- ☐ The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issues or causes of action (*specify moving party, type of motion, and reasons*):

15. Other motions

- ☒ The party or parties expect to file the following motions before trial (*specify moving party, type of motion, and issues*):
- Motion for summary judgment/adjudication

16. Discovery

- a. ☐ The party or parties have completed all discovery.
- b. ☒ The following discovery will be completed by the date specified (*describe all anticipated discovery*):

<u>Party</u>	<u>Description</u>	<u>Date</u>
Defendant	written discovery	Feb 2020
Defendant	Plaintiff's deposition	April 2020

- c. ☐ The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (*specify*):

PLAINTIFF/PETITIONER: Brenda Perry	CASE NUMBER: 18CIV05717
DEFENDANT/RESPONDENT: Ashfield Healthcare, LLC et al.	

17. Economic litigation

- a. ☐ This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 90-98 will apply to this case.
- b. ☐ This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed (*if checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case*):

18. Other issues

- ☐ The party or parties request that the following additional matters be considered or determined at the case management conference (*specify*):

19. Meet and confer

- a. ☐ The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (*if not, explain*):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (*specify*):

20. Total number of pages attached (*if any*): _____

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date: December 2, 2019

Rebecca Benhuri

(TYPE OR PRINT NAME)



(SIGNATURE OF PARTY OR ATTORNEY)



(SIGNATURE OF PARTY OR ATTORNEY)

☐ Additional signatures are attached.

4848-0254-0462.1 098757.1001

PROOF OF SERVICE

STATE OF NEVADA, COUNTY OF CLARK

I am employed in the County of Clark, State of Nevada. I am over the age of 18 and not a party to the within action; my business address is 3960 Howard Hughes Parkway, Suite 300, Las Vegas, NV 89169.

On December 03, 2019, I served the foregoing document(s) described as **CASE MANAGEMENT STATEMENT** on the interested parties in this action addressed as follows:

Michael T. Welch Esq.
LAW OFFICES OF MICHAEL T. WELCH
Four Embarcadero Center, 14th Floor
San Francisco, CA 94111

Attorneys for Plaintiff

☒ By placing true copies thereof enclosed in a sealed envelope(s) addressed as stated above.

☒ **BY MAIL (CCP § 1013(a)&(b)):** I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Las Vegas, Nevada in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one date after date of deposit for mailing the affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on December 03, 2019, at Las Vegas, Nevada.



Ashley Eugene

4833-6936-2344.1 079499.1058

Exhibit Y

**SUPERIOR COURT OF SAN MATEO COUNTY**

400 County Center 1050 Mission Road
 Redwood City, CA 94063 South San Francisco, CA 94080
www.sanmateocourt.org

Minute Order**BRENDA PERRY vs. ASHFIELD HEALTHCARE, LLC, a business entity, et al**

18-CIV-05717

12/11/2019 9:00 AM

Case Management Conference

Hearing Result: Held**Judicial Officer:** Grandsaert, John L.**Location:** Courtroom 2D**Courtroom Clerk:** Cheryl Lyssand**Courtroom Reporter:**

Parties Present

Exhibits

MinutesJournals

- Attorney Michael T. Welch appeared by CourtCall on behalf of the plaintiff.

Attorney Rebecca Benhuri appeared by CourtCall on behalf of defendant Ashfield Healthcare, LLC.

Attorney Ashley A. Baltazar appeared on behalf of defendant Boehringer-Ingelheim Pharmaceutical.

The Court deems this matter at issue.

Master Calendar to set PLAINTIFF jury trial for: October 5, 2020.

Jury Trial estimated 7 days.

Master Calendar to set a MSC date accordingly & send proper notice.

There is no ADR ordered in this matter.

- 6 -

Case Events

- Master Calendar to set MSC date accordingly and send notice

OthersComments:

Future Hearings and Vacated Hearings

January 14, 2020 9:00 AM Motion to Compel Further
 Law and Motion, -

Exhibit Z

**SUPERIOR COURT OF SAN MATEO COUNTY**

Civil Department
 400 County Center, Redwood City, CA 94063
 (650) 261-5100
www.sanmateocourt.org

BRENDA PERRY Plaintiff (s) vs. ASHFIELD HEALTHCARE, LLC, A BUSINESS ENTITY Defendant (s)	Case Number: 18-CIV-05717 Clerk's Notice of Jury Trial and Mandatory Settlement Conference
Title: BRENDA PERRY VS. ASHFIELD HEALTHCARE, LLC, A BUSINESS ENTITY, ET AL	

MICHAEL T WELCH
 LAW OFFICES OF MICHAEL T WELCH
 FOUR EMBARCADERO CENTER 14TH FLOOR
 SAN FRANCISCO CA 94111

ERIC MECKLEY
 MORGAN LEWIS & BOCKIUS LLP
 ONE MARKET
 SPEAR STREET TOWER
 SAN FRANCISCO CA 94105-1126

ASHLEY ADRIANNE BALTAZAR
 MORGAN LEWIS & BOCKIUS LLP
 ONE MARKET
 SPEAR STREET TOWER
 SAN FRANCISCO CA 94105-1596

REBECCA BENHURI
 LITTLER MENDELSON PC
 333 BUSH STREET
 34TH FLOOR
 SAN FRANCISCO CA 94104

The above named parties and their respective attorneys are hereby notified that the above matter is calendared for a **Mandatory Settlement Conference** on **9/23/2020** at **1:30 PM** at the Hall of Justice and Records, 400 County Center, Redwood City, California 94063.

Parties are directed to comply with Local Rule of Court 2.4 and are admonished that the Court will insist on strict compliance therewith. Sanctions may be imposed for failure to comply. A conference statement shall be delivered to the Court with proof of actual service on the opposing party no less than five (5) court days before the date of the hearing.

The above named parties and their respective attorneys are hereby notified that the above matter is calendared for **Jury Trial** on **10/5/2020** at **9:00 AM** at the Hall of Justice and Records, 400 County Center, Redwood City, California 94063.

Note: Jury fees must be posted within the time required by CCP Section 631.

Pursuant to Rules 3.1385, California Rules of Court, you must advise the Court of any change of status, or settlement of this case.

CLERK'S CERTIFICATE OF MAILING

I hereby certify that I am the clerk of this Court, not a party of this cause; that I served a copy of this notice on the below date, by placing a copy thereof in separate sealed envelopes addressed to the address shown by the records of this Court, and by then sealing said envelopes and depositing same, with postage fully pre-paid thereon, in the United States Mail at Redwood City, California.

Date: 12/11/2019

Neal I Taniguchi, Court Executive Officer/Clerk

By: _____

Blanca Solis,
Deputy Clerk